

NORTH DAKOTA PUBLIC SERVICE COMMISSION

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In the Matter of the Application of Dakota)
Access LLC for a Certificate of Site)
Compatibility and Route Permit for the Dakota)
Access Pipeline Project in Mountrail,)
Williams, McKenzie, Dunn, Mercer, Morton)
and Emmons Counties, North Dakota)
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Case No. PU-I 4-842

CERTIFICATE OF SERVICE



I hereby certify that true and correct copies of the **PETITION TO INTERVENE OF DANIEL H. AND CHARLOTTE NEUROHR and AFFIDAVIT OF DANIEL H. AND CHARLOTTE NEUROHR** were on May 14, 2015, filed with the North Dakota Public Service Commission and mailed to the following:

Lawrence Bender
Fredrickson & Byron, PA
1133 College Drive, Suite 1000
Bismarck, ND 58501

Dated this 14th day of May, 2015.

BAUMSTARK BRAATEN LAW PARTNERS
Attorneys for Daniel H. and Charlotte Neurohr
109 North 4th Street, Suite 100
Bismarck, ND 58501
Phone: 701-221-2911
Fax: 701-221-5842

/s/ Derrick Braaten
By: Derrick Braaten

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**PETITION TO INTERVENE OF
DANIEL H. AND
CHARLOTTE NEUROHR**

Pursuant to N.D.A.C. § 69-02-02-05, Daniel H. and Charlotte Neurohr, by and through their attorneys Derrick Braaten and Matt Kelly (collectively, “Petitioners”), hereby petition to intervene in the above-captioned proceedings. In support of this petition, Petitioners state and allege as follows:

1. Daniel H. and Charlotte Neurohr live at 7875 Highway 200, Dodge, ND 58625. Daniel H. and Charlotte received documents from Dakota Access, LLC and offers for an easement over their land for the Dakota Access Pipeline Project, and have also received repeated requests for survey permission on their property.
2. Daniel and Charlotte’s property will be crossed by the Dakota Access Pipeline Project, and they are concerned about impacts to their land. The Neurohrs have not yet been able to reach an agreement with Dakota Access regarding an easement on their property, and feel it is necessary to protect their interests by ensuring that they are represented in these

proceedings.

3. Petitioners have a direct and substantial interest in these proceedings, as well as legal property rights which may be substantially affected by the ND Public Service Commission's findings and conclusions in this matter. Petitioners are intimately familiar with the land they own and rent, and can provide the PSC with specific information related to its routing determination in this proceeding, with respect to their individual lands.
4. Petitioners are not adequately represented by existing parties, and Petitioners' intervention would not unduly broaden the issues or delay the proceedings, particularly given the early nature of the proceedings.
5. Petitioners are not necessarily in support of or opposed to the relief sought by the applicant in this proceeding, but intend to oppose such relief if it allows Dakota Access to cross the lands they own and rent in a manner that will cause unnecessary or unreasonable damage to the land and to their farming operations.

Dated this _____ day of April, 2015.

BAUMSTARK BRAATEN LAW PARTNERS

 /s/ Derrick Braaten
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**AFFIDAVIT OF DANIEL H. AND
CHARLOTTE NEUROHR**

STATE OF NORTH DAKOTA)
)ss.
COUNTY OF DUNN)

Daniel H. and Charlotte Neurohr, husband and wife, being duly sworn, state under oath as follows:

1. We live at 78785 Highway 200, Dodge, ND 58625.
2. We have received documents from Dakota Access, LLC and offers for an easement over our land for the Dakota Access Pipeline Project, and have also received repeated requests for survey permission on our property.
3. Our property will be crossed by the Dakota Access Pipeline Project, and we are concerned about impacts to our land. We have not yet been able to reach an agreement with Dakota Access regarding an easement on our property, and feel it is necessary to protect our interests by ensuring that they are represented in these proceedings.

Dated this 17th day of April, 2015.

Daniel H. Neurohr
Daniel H. Neurohr

Dated this 17th day of April, 2015.

Charlotte Neurohr
Charlotte Neurohr

STATE OF NORTH DAKOTA)
)ss.
COUNTY OF DUNN)

On this 17th day of April, 2015, before me personally appeared Daniel H. and Charlotte Neurohr, husband and wife, and known to me to be the same persons who are described in and who executed the within document, and acknowledged to me that they executed the same.

DIANE ALLMENDINGER
Notary Public
State of North Dakota
My commission expires Mar 21, 2019

Diane Allmendinger
Notary Public

